

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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Hicham Azkour,

*Plaintiff,*

Index No. 10-CV-4132 (RJS)(KNF)

-v-

DEFENDANT'S PROPOSED  
VOIR DIRE QUESTIONS

Little Rest Twelve, Inc., Nina Zajic,  
David Kay, and Abderrahmane a/k/a  
Peter Eljastimi

*Defendants.*  
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Defendant Little Rest Twelve, Inc., by and through its attorneys Hoffmann & Associates, respectfully submits the following proposed voir dire questions to be asked of prospective jurors by the Court in accordance with this Court's Order. Further, defendant respectfully requests an opportunity for counsel to be able to individually question prospective jurors after the prospective jurors have completed their questionnaires and the Court has concluded its inquiries.

1. Are you employed? If so, please describe your job, your duties and how long you have been at your current job?
2. Have you or any members of your family or close friends been unemployed during the last five (5) years? If so, describe their search for a new job and whether they were able to find one?
3. Does anyone in your family or a close friend suffer from mental illness? If so, please describe their symptoms and whether and how it impacts their ability to find and maintain employment?
4. Does anyone in your family or a close friend work in a restaurant? If so, please describe their duties and explain how they obtained their current position?

5. Have you or any members of your family or close friends ever sued or made a claim against an employer for unfair treatment, including but not limited to claims concerning overtime pay or retaliation? If so, please describe who made the claim and the reasons for the claim. Did litigation result? How was it resolved? Was it resolved satisfactorily? If someone other than you filed the claim, do you have an opinion as to whether he or she should have filed the claim? Why or why not?

6. When considering the times in which we live, in addition to your own personal experiences, is there anything that you can identify that would cause you to start off on the side of the employee in an employment dispute, even just a little bit, before hearing any evidence in this case whatsoever? If so, please explain.

7. Do you understand and can you assure both parties that you will wait until you have heard all of the testimony from all of the witnesses and carefully listened to the Judge's instructions on the law before you form any conclusions?

8. Should you find yourself in a situation where your personal opinion conflicts with the law and you believe that the law is not right, would any of you be unable in that situation to still follow the law and apply it to the facts of this case?

9. Do you know what the Fair Labor Standards Act is? If so, how do you know about it?

10. Do you believe that you will have a hard time setting aside any sympathy you may feel for one party or the other in your determination of the issues?

11. How do you feel about people who lie?

12. Are you frustrated or upset about being here today?

Dated: New York, New York  
June 30, 2014

Respectfully submitted,

**HOFFMANN & ASSOCIATES**

By: s/ANDREW S. HOFFMANN

**Andrew S. Hoffmann, Esq.**

*Attorneys for Defendant Little Rest Twelve, Inc.*

**450 Seventh Avenue, Suite 1400**

**New York, New York 10123**

**Tel (212) 679-0400**

**Fax (212) 679-1080**